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GLEN COVE
INDUSTRIAL DEVELOPMENT AGENCY

City Hall, 9 Glen Street, Glen Cove, NY 11542

August 31, 2016

Lorenzo Thantu, Remedial Project Manager
Emergency and Remedial Response Division
United States Environmental Protection Agency – Region II
290 Broadway, 20th Floor
New York, NY 10007

Re: Li Tungsten Superfund Site (Site No. HW130046)
Glen Cove, New York
Remedial Action Work Plan

Dear Mr. Thantu:

On behalf of the Glen Cove Industrial Development Agency (GCIDA), we are in receipt of comments provided by the United States Environmental Protection Agency (USEPA) in the letter dated August 29, 2016 relating to the Remedial Action Work Plan (RAWP) prepared for the above referenced Site. The following presents a summary of the comments provided by the USEPA and our associated responses:

Comment No. 1: Figure 3 – Remedial Excavation Plan must be replaced with the revised figure that shows stormwater piping and structures layout.

Response to Comment No. 1: Figure 3 has been revised and replaced accordingly.

The following provides a summary of comments also provided by the New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) relative to the RAWP for the above referenced site along with our associated responses:

Comment No. 1: Title Page: Please replace the outdated NYSDEC symbol with the updated NYSDEC emblem.

Response to Comment No. 1: The document has been revised accordingly.

Comment No. 2: Section 1.3: Please include a figure with sample locations and contamination noted.

Response to Comment No. 2: The document has been revised to include Figure 3 – Sit Characterization Plan depicting the requested information.

Comment No. 3: Section 3.9 Paragraph 5: Please state the sampling frequency in addition to referencing DER-10. Please note that if contamination is noted at multiple depths within an excavation area, each zone of contamination's sidewalls will be sampled in accordance with DER-10 (i.e., if contamination is found at 2-4 feet (ft) below ground surface (bgs) and 8-10 ft bgs, sidewall samples will be collected from the 2-4 ft bgs interval and 8-10 ft bgs interval at the frequency required by DER-10).

Response to Comment No. 3: The sampling frequency has been noted, as well as, the requirement to collect sidewall samples in association with each zone of contamination.

Comment No. 4: Section 3.9 Paragraph 6: Please note "the exceedance of protection of groundwater concentrations pertains to any current or future storm water retention basins or infiltration structures." The Remedial Action Plan must take into consideration future use of the site. Please see comment 19 below with regards to denoting future structures on site.

Response to Comment No. 4: The paragraph has been modified accordingly to reference applicable Protection of Groundwater Standards as defined in 6 NYCRR Part 375 6.8(b) for any excavation performed within the area of any current or future storm water retention basins or infiltration structures.

Comment No. 5: Section 3.9 Paragraph 6: Prior to backfilling the area of excavation the area will be surveyed including locations of final confirmation samples.

Response to Comment No. 5: The paragraph has been revised to include surveying the excavation extents, as well as, location of final confirmation samples prior to backfilling.

Comment No. 6: Section 3.9 Paragraph 8: All trucks hauling excavated material from site will be water tight.

Response to Comment No. 6: The paragraph has been revised to state that “material slated for transport will be properly dewatered to ensure the material is ready for transport. In the event that the material slated for transport is not able to be properly dewatered, water tight trucks will be utilized to transport the material to the approved disposal facilities.”

Comment No. 7: Section 3.10 Paragraph 1: If contamination is noted in multiple depths within an excavation area, each zone of contamination’s sidewalls will be sampled in accordance with DER-10.

Response to Comment No. 7: The paragraph has been revised accordingly to indicate that sidewall samples will be collected from each zone of contamination in accordance with DER-10.

Comment No. 8: Section 3.11 Paragraph 2: Please see Comment 6.

Response to Comment No. 8: The paragraph has been revised to state that “material slated for transport will be properly dewatered to ensure the material is ready for transport. In the event that the material slated for transport is not able to be properly dewatered, water tight trucks will be utilized to transport the material to the approved disposal facilities.”

Comment No. 9: Section 3.11: A truck wash station will be used for all trucks that have entered into the zone of contamination.

Response to Comment No. 9: The note regarding use of a truck wash station has been added to the section accordingly.

Comment No. 10: Section 3.13: Backfill meeting the requirements of the Record of Decision but exceeding unrestricted use can only be used if placed beneath a cover as outlined in the Record of Decision. The cover system shall be placed within the same construction season.

Response to Comment No. 10: The document has been revised to denote that material slated for reuse will be in accordance with the requirements of the ROD and to indicate that a cover system will be installed at each respective excavation location upon successful completion of remedial excavation activities.

Comment No. 11: Section 3.13 Paragraph 4: Excavated soil not suitable for backfill will be disposed appropriately offsite.

Response to Comment No. 11: The paragraph has been modified accordingly to indicate that excavated soil not suitable for use as backfill will be disposed appropriately offsite in accordance with applicable federal, state and local requirements.

Comment No. 12: Section 3.15 Paragraph 1. Please see Comment 7.

Response to Comment No. 12: The paragraph has been revised accordingly to indicate that sidewall samples will be collected from each zone of contamination in accordance with DER-10.

Comment No. 13: Section 3.15 Paragraph 1: Backfill shall meet the requirements of Record of Decision. A request for Beneficial Use Material shall be submitted separate from the Remedial Action Work Plan.

Response to Comment No. 13: The paragraph has been modified accordingly to indicate that backfill materials will meet the requirements of Record of Decision. Additionally, please note that the request for Beneficial Use Material has been removed from the document and will be submitted under separate cover if such material sources are proposed for use.

Comment No. 14: Section 3.15 Paragraph 1: All backfill will be tested in accordance to DER-10 Table 5.4(e)10.

Response to Comment No. 14: The paragraph has been modified accordingly.

Comment No. 15: Section 3.15.1 Paragraph 2: Recycled Concrete Aggregate use will be subject to NYSDEC approval of source.

Response to Comment No. 15: The paragraph has been revised to include RCA approval requirements.

Comment No. 16: Appendix C, CAMP: Please clarify why hydromulch will be used for vapor suppression instead of the traditional vapor suppressant foam. I understand that hydromulch is commonly used as landfill daily cover but I am not sure if it will be effective against the types of odors/vapors which may be encountered during remedy implementation at this site.

Response to Comment No. 16: The use of hydromulch has been replaced by vapor suppressant foam.

Comment No. 17: General: Please revise to include a section on surveying of excavations, confirmation sample locations, and cover system.

Response to Comment No. 17: Section 3.6 has been revised accordingly.

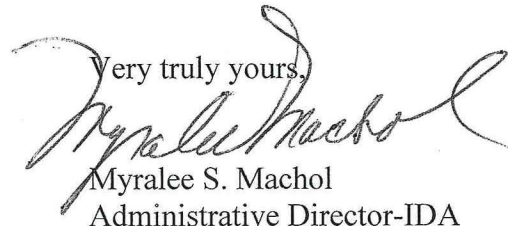
Comment No. 18: Drawing 1 and 2: Please outline the site as indicated in the Record of Decision to maintain consistency.

Response to Comment No. 18: The drawing has been modified accordingly to outline the approximate operable unity boundaries consistent with what is depicted in the Record of Decision.

Comment No. 19: Revised Drawing 3: Please include a note indicating that storm drain end points shown anticipate relocation of the bulkhead for the proposed marina.

Response to Comment No. 19: A general note has been added to the drawing indicating that the location of the stormwater conveyance system anticipate the relocation of the bulkhead for the proposed marina.

Attached please find a final version of the RAWP with all revisions noted above incorporated for your approval. GCIDA also respectfully requests consideration to mobilize to the Site on September 12, 2016 to commence remedial excavation activities outlined in the submitted plan. Should you have any questions or require any additional information, please do not hesitate to contact me at (516) 676-1625, Ext. 102.

Very truly yours,

Myralee S. Machol
Administrative Director-IDA

Attachment

KG(t)/j

cc: D. Garbarini (USEPA)
S. Badalamenti (USEPA)
M. Cruden (NYSDEC)
G. Burke (NYSDEC)
H. Dudek (NYSDEC)
Honorable Reginald Spinello
F. Haftel (RXR)
J. Lasserson (RXR)
F. DeVita (D&B)